

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

IRON WORKERS' MID-AMERICA	)	
PENSION PLAN, et al.,	)	
	)	
Plaintiffs,	)	CIVIL ACTION
	)	
vs.	)	NO. 22 C 0196
	)	
VEI SOLUTIONS, INC.,	)	JUDGE ELAINE E. BUCKLO
an Illinois corporation,	)	
	)	
TRANQUILINO R. VENTURA,	)	
an individual,	)	
	)	
Defendants.	)	

**MOTION FOR ENTRY OF DEFAULT AND JUDGMENT**

Plaintiffs, by their attorneys, and pursuant to Federal Rule of Civil Procedure Rule 55(b), move for entry of judgment by default against Defendant, VEI SOLUTIONS, INC., an Illinois corporation,<sup>1</sup> in the total amount of \$216,092.21, plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,544.00.

On January 14, 2022, the Summons and Complaint was served on the Registered Agent for Defendant, VEI Solutions, Inc., by tendering a copy of said documents to him personally at his place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant VEI's answer was due on February 4, 2022. Thereafter, Plaintiffs' First Amended Complaint was served on Defendant, VEI Solutions, Inc., on January 25, 2022 (a copy of the Affidavit of Service is attached hereto) and Defendant's answer was due on February 8, 2022.

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<sup>1</sup>The individual Defendant, Tranquilino R. Ventura, an individual, has filed an appearance through counsel and an unopposed motion for an extension of time to answer. Accordingly, Plaintiffs are only seeking relief from the corporate Defendant at this time.

As Defendant, VEI Solutions, Inc., an Illinois corporation, has failed to timely answer the First Amended Complaint, Plaintiffs respectfully request entry of default and judgment pursuant to F.R.Civ.P. Rule 55(b).

/s/ Patrick N. Ryan

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that he electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 18th day of March 2022:

Mr. Tranquilino R. Ventura, Registered Agent  
VEI Solutions, Inc.  
1800 Howard Street, Suite A  
Elk Grove Village, IL 60007-2482

I further certify that on or before the hour of 5:00 p.m., this 18th day of March 2022, I filed the foregoing document with the Clerk of Court using the CM/ECF system, which will send notification to the following CM/ECF participants:

Mr. Mitchell S. Chaban  
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